

7C2  
FEB 15 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUIRED

Ms. Flor del Valle  
Director  
Land Pollution Control Area  
Puerto Rico Environmental Quality Board  
P. O. Box 1481  
Santurce, Puerto Rico 00910-1488

Re: RCRA Facility Assessment (RFA) Report  
Caribe General Electric Products, Inc.  
Rio Piedras, Puerto Rico - EPA I.D. No. PRD000692590

Dear Ms. del Valle:

The U. S. Environmental Protection Agency (EPA) has reviewed the RFA report on Caribe General Electric Products, Inc. prepared by the Puerto Rico Environmental Quality Board (EQB) and submitted to us with your letter dated November 14, 1989.

This review was conducted in accordance with the RCRA Facility Assessment Training Program guidance prepared by A. T. Kearney, Inc., under EPA contract No. 68-01-7038. We have determined that the RFA report is incomplete. Attached to this letter are our comments and a copy of the above mentioned document. Please incorporate our comments and provide us with a revised RFA report.

If you have any questions regarding this matter, please feel free to contact Luis Negrón, of my staff, at (212) 264-0994.

Sincerely yours,

James Reidy, P. E. Chief  
Caribbean Facilities Section  
Hazardous Waste Facilities Branch

Enclosure

bcc: James Reidy, 2AWM-HWF w/o encl. ✓  
Luis Negron, 2AWM-HWF w/o encl.  
Douglas Pocze, 2AWM-HWF w/o encl.

Comments on RFA for Caribe General Electric  
Products, Inc., Rio Piedras, Puerto Rico  
PRD000692590

1) II. Facility and Process Description

c. Identification of all waste streams

The RFA report should include a discussion on process drain and sewer systems associated with the manufacturing processes and SWMUs. This discussion must include, at a minimum, the material of construction, age of the system, any release incident, integrity of the system, and maintenance record protocol.

2) V. Solid Waste Management Units (SWMU's) and Areas of Concern (AOC's)

a. SWMU-1 & B. AOC-1

The report does not indicate whether the container storage area (SWMU-1) and the paint room (AOC-1) had any floor drains, floor cracks, or any other means through which prior release could have migrated.

3) General Comment on the report

A "Target to Population" section, should be included in the report, which addresses target population which may be affected by any release of hazardous waste or hazardous constituents to the environment from any SWMU.



ESTADO LIBRE ASOCIADO DE PUERTO RICO / OFICINA DEL GOBERNADOR

Junta  
de Calidad  
Ambiental

ENVIRONMENTAL  
PROTECTION AGENCY  
REGION II

89 NOV 21 PM 12:55

HAZARDOUS WASTE  
FACILITIES BRANCH

November 14, 1989

Mr. James Reidy, Chief  
Caribbean Facilities Section  
Hazardous Waste Facilities Branch  
US Environmental Protection Agency  
26 Federal Plaza - Region II  
New York, New York 10278

RE: RCRA Facility Assessment Report  
Caribe General Electric Products,  
Inc., Río Piedras, Puerto Rico  
→ PRD000692590; PRD090399973

Dear Mr. Reidy:

Enclosed please find the RFA Report prepared for Caribe General Electric Products, Inc., Río Piedras, Puerto Rico, as committed for the fourth quarter of FY-89.

If you need additional information, please contact Mr. Harold Carrasquillo or Mr. Carlos Martínez, at (809) 723-1697.

Cordially,

*Flor L. del Valle*  
Flor L. del Valle  
Director

Land Pollution Control Area

SC/eas

Enclosure

TABLE OF CONTENTS

	<u>PAGE</u>
I. Introduction	1
II. Facility and Process Description	3
A. History	3
B. Present Facility Operations	10
C. Identification of All Waste Streams	15
D. Regulatory History	18
E. Maps	18
III. Environmental Setting	19
A. Surrounding Land Use	19
B. Meteorology	19
C. Surface Hydrology	19
D. Geology and Soils	20
E. Hydrogeology	20
IV. Visual Site Inspection	21
V. Solid Waste Management Units and Areas of Concern	22
A. SWMUL	22
B. AOC1	25
VI. Conclusions and Further Actions	26

RCRA FACILITY ASSESSMENT REPORT  
CARIBE G.E. PRODUCTS, INC.  
RIO PIEDRAS, PUERTO RICO  
PRD000692590  
PRD090399973

I. INTRODUCTION

A RCRA Facility Assessment (RFA) embraces the identification of past, present or potential releases of hazardous wastes or hazardous constituents into the environment from any unit or activity that involves management of solid wastes as defined in 40 CFR 261.2 in a permitted or under interim status facility. The assessment shall address releases of hazardous wastes or constituents to all media including soil, groundwater, surface water, air, and the generation of subsurface gas. Any release that has migrated beyond the facility boundaries shall also be considered. The ulterior purpose of an RFA will be the implementation of corrective actions where necessary as mandated by the 1984 Hazardous and Solid Waste Amendments (HSWA) made to the Resource Conservation and Recovery Act (RCRA).

The present project is intended to identify the Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) that could have potential or a history of hazardous wastes releases at Caribe General Electric Products, Inc. of Río Piedras, Puerto Rico (PRD000692590, PRD090399973). This facility is located at La Brisa Street #5, Sabana Llana Ward, Río Piedras, Puerto Rico (latitude 18°23'56.0"N and longitude 66°01'25.0"W). Its postal address is:

Caribe General Electric Products, Inc.  
La Brisa Street #5  
Sabana Llana Ward  
Río Piedras, Puerto Rico 00924

and the local contact person for environmental affairs is:

Mr. Ernesto Mieres  
Plant Manager  
(809) 765-0812

A Solid Waste Management Unit is defined as "any discernible unit at which solid or hazardous wastes have been placed at any time irrespective of whether the unit was intended for the management of solid or hazardous waste. It would include any area at which hazardous waste or hazardous constituents have been routinely and systematically released; but, it would not include accidental spills from production areas and units in which wastes have not been managed"<sup>4</sup>. In the other hand, an Area of Concern is defined as "any area at which hazardous wastes or hazardous constituents have been

released but such release is not routinely and systematically done. An AOC also include any area for which there is a suspicion that a release occurred."<sup>4</sup>

Identification of SWMU's and AOC's at Caribe General Electric Products, Inc. has been performed through a preliminary review of EQB's file and two visual site inspections.

The preliminary review included the following files: Closure Plan for the Hazardous Wastes Storage Area, EQB Hazardous Wastes Division files and Air Quality Program files.

A preliminary visit was performed on June 19, 1989 during which EQB personnel familiarized themselves with facility operations and one duly completed copy of the questionnaire "Information Regarding Potential Hazardous Wastes and Hazardous Waste Constituents Releases from Solid Waste Management Units" was obtained from facility representatives.

A visual site inspection was performed on September 5, 1989 in order to complete facility information and to reinspect the SWMUs and AOCs. Also, photos from SWMUs and Areas of Concern were obtained.

After evaluation of all the gathered information, conclusions will be presented addressing the release potential of each SWMUs and AOCs with respect to all the environmental media and further actions will be recommended.



## II. FACILITY AND PROCESS DESCRIPTION

### A. HISTORY

Caribe General Electric Products, Inc. began manufacturing operations on March 1, 1966 (building 1). On August 1, 1969 building #2 began manufacturing operations.

At present, the facility (building #2) is engaged mainly in the storage of finished products manufactured in other local subsidiaries of the company, although it also manufactures some plastic parts for electrical accessories.

Prior to 1986 the facility was engaged in the manufacture of fuses and other related electrical accessories (Current Limiting Fuses, Home Lighting Protectors, Fuse Link, Radio Energy Management System), Watt Hour Meters and Electrical Relays.

Originally the facility consisted of two buildings (building #1, and #2) with approximately 65,080 square feet of office and operations areas established in a property of approximately four acres.

During 1986 building #1 was sold to another G.E. subsidiary (General Electric of Caribe). Since this date on facility consists of building #2 only.

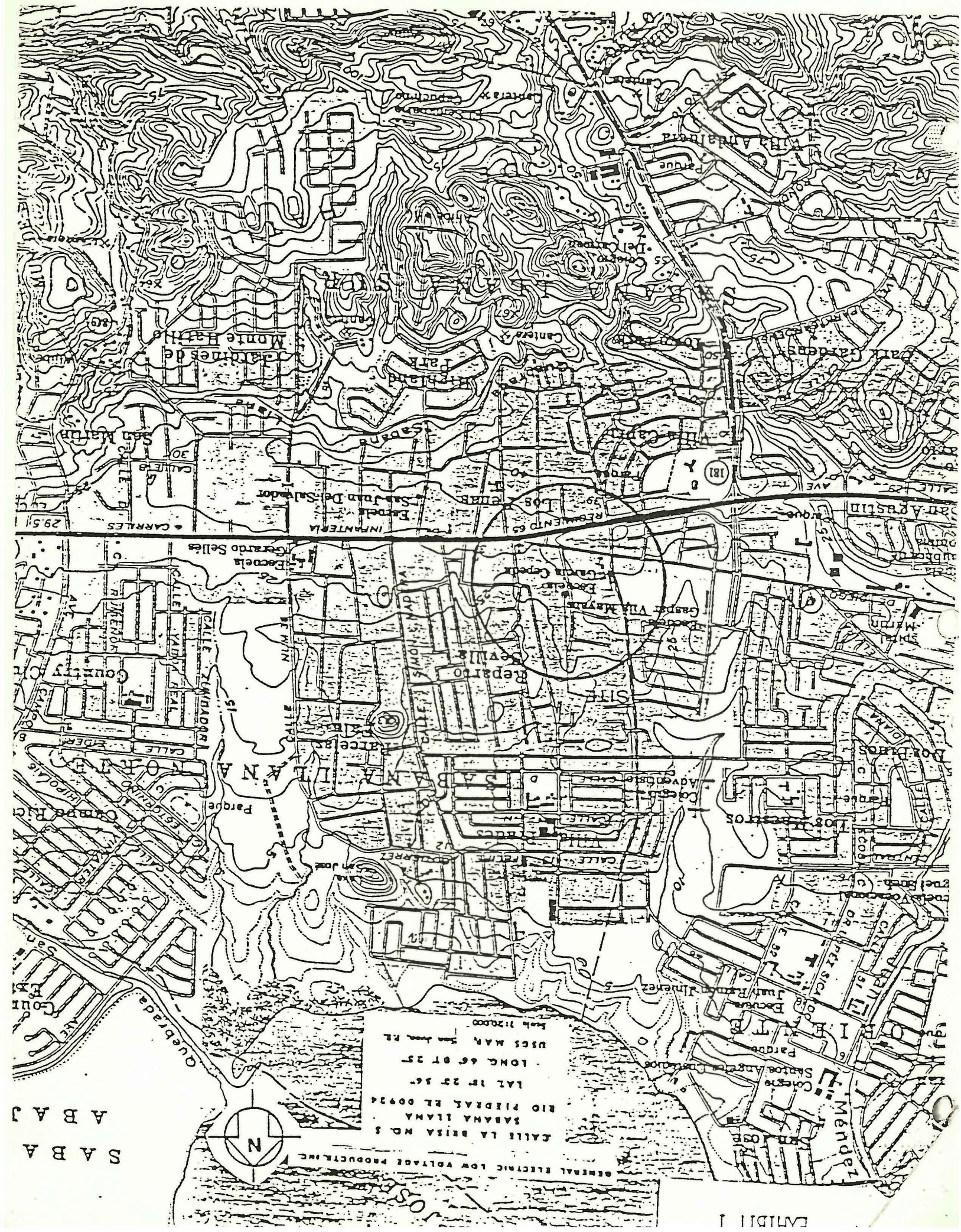
This building is owned by the Puerto Rico Industrial Development Company (PRIDCO).

At present, 30 employees work for the facility.

The facility submitted its Notification of Hazardous Wastes Activity and Part A Permit Application on August 18, 1980 and on November 19, 1980 respectively. (See Attachment 8).

The company notified that they were a Generator, Transporter, and a Treatment, Storage and Disposal facility.







The company reported in the original Part A (for building #2) the following hazardous wastes, processes and quantities:

<u>Hazardous Waste</u>	<u>Estimated Annual Quantity of Waste</u>	<u>Process Codes</u>
K054	900 pounds	T03 (Incinerator) D80 (Landfill)
D002	400 pounds	T03, D80
D001 (D002)	100 pounds	T03, D80
U133	10 pounds	S01 (Container)
D001	500 pounds	S01

For building #1 the company reported in the original Part A the following hazardous wastes, processes and quantities:

<u>Hazardous Waste</u>	<u>Estimated Annual Quantity of Waste</u>	<u>Process Codes</u>
K054	900 pounds	T03 (Incinerator) D80 (Landfill)
D002	400 pounds	T03, D80
D001(D002)	100 pounds	T03, D80
F001	18 pounds	S01 (Container)
F004	200 pounds	S01
D001	2,200 pounds	S01
D002	7,000 pounds	S02 (Tank)
D008	1,000 pounds	S01
P104 (P098)	50 pounds	S01
U133	20 pounds	S01

The most recent revised Part A Permit Application was submitted on September 11, 1987 (See Attachment 9).

This amended part A Permit Application included the following wastes:

<u>Hazardous Waste</u>	<u>Estimated Annual Quantity of Waste</u>	<u>Process Codes</u>
K054	900 pounds	T03, D80
D002	400 pounds	T03, D80
D001 (D002)	100 pounds	T03, D80
D001	2,200 pounds	S01
D002 (D006, D007, D008)	2,500 pounds	S01
D007	1,500 pounds	S01
D003 (D011)	10,000 pounds	S01
F001	3,500 pounds	S01
D008	5,000 pounds	S01
D008 (D001)	1,500 pounds	S01
F004	400 pounds	S01

This amended Part A Permit Application responds to deletion of some raw materials that were reported as hazardous wastes but were never generated on the facility.

A Hazardous Wastes Containers Storage Area located on building #2 has been used since 1981 for the storage of the following wastes; Flux Oil (D008), Spent Oil (D008), 1,1,1 Trichloroethane (F001), Sludge from phosphatizing process (D007), Rinsewaters from

electroplating operations (D003, D011), Corrosive Solution from Bright Dip Process (D002), Waste Paint (D001), Spent Cresylic Acid (F004), Vinyl Toluene (D001), Mixed Acids (D002, F007), Waste Oxidizer (D002, D007), Alcohol Flux (D001), Sodium Hydroxide (D002), Polybutadiene Resin (D001), Waste Thinner and Toluene.

Building #2 is authorized to operate air emissions sources with permit #PFE-36-0786-0522-I-II-0 issued by the EQB Air Quality Program.

Table 1 summarizes the history of the facility from the date operations started to present, including Full RCRA Inspections performed.

**TABLE 1: HISTORICAL SUMMARY OF CARIBE GENERAL ELECTRIC PRODUCTS, INC.**

DATE	EVENT	COMMENTS
March 1, 1966	Building #1 started operations	
August 1, 1969	Building #2 started operations	
August 18, 1980	Notification of Hazardous Waste Activity received at EPA	Acknowledged on November 7, 1980
November 19, 1980	Part A Permit Application received at EPA	Acknowledged on January 15, 1981
August 20, 1981	Full RCRA TSD Inspection	Closure Plan was found to be not in accordance with the Regulation for the Control of Hazardous and Non-Hazardous Solid Wastes (265.110, 265.142)

DATE	EVENT	COMMENTS
March 15, 1983	Full RCRA Generator Interim Status Inspection	Violations to the Regulation for the Control of Hazardous and Non-Hazardous Solid Wastes: <u>Rule 808</u> Personnel training must be annually amended. <u>Rule 810</u> Deficiencies were found on the SPCC Plan regarding evi- dence of the arrange- ments with local authorities.
June 7, 1984	Full RCRA Generator and Interim Status Inspection.	In Compliance
October 2, 1984	Full RCRA Transporter Inspection	In compliance with the transportation requirements.
September 8, 1984	Spill Incident	20 - 25 G of cresylic acid were spilled on the painting room in building #1.
January, 1985	Change in facility name	From General Electric Low Voltage Products Inc. to Caribe Gen- eral Electric Prod- ucts, Inc.
March 1, 1985	Full RCRA TSD inspection.	In Compliance
March 15, 1985	Waste Analysis Plan	

DATE	EVENT	COMMENTS
October 20, 1985	Closure Plan for the Hazardous Wastes Storage Area was submitted	Revisions: December 24, 1986, December 31, 1986, September 15, 1987. Public Notice: January 16, 1988. Closure Activities of the hazardous wastes storage area were performed during July 12-16 and August 13-15, 1988. A certification of completion of closure for this unit was submitted on September 30, 1988.
March 19, 1986	Full RCRA Transporter Inspection	In compliance with the 40 CFR 263 requirements for Transporter of Hazardous Wastes.
April 25, 1986	Full RCRA Generator and TSD Inspection	Some violations were found in regard to the following rules of the Regulation for the Control of Hazardous and Non-Hazardous Solid Wastes. <u>Rule 808C</u> (40 CFR 265.16) Facility's compliance with the Personnel Training. <u>Rule 810C</u> (265.37) Arrangements with local authorities. <u>Rule 803E</u> (265.51) Content of contingency plan was insufficient. <u>Rule 803E</u> (265.53) Copies of the contingency plan had not been distributed in compliance with this section.

DATE	EVENT	COMMENTS
		<u>Rule 803E</u> (265.54) Contingency plan must be amended and re- viewed whenever the facility changes. <u>Rule 803E</u> (265.55; 265.56) Emergency Procedures of the Contingency Plan.



## B. PRESENT FACILITY OPERATIONS

At present, this facility (building #2) is engaged mainly in the storage of finished products manufactured in other local subsidiaries of the company, although it also manufactures some plastic parts for electrical accessories on two Injection Molding Machines.

In addition, some welding is performed according to the customer requirements for adding of copper to breakers manufactured in another G.E., facility.

One punch press machine also operates on building #2.

Prior to 1986 the facility consisted of two buildings (building #1, building #2) and was engaged in the manufacture of fuses and other related electrical accessories.

The manufacturing process performed at this facility prior to 1986 included the following steps:

### Building #1 - Manufacture of Electrical Relays and Watt Hour Meters

- 1) Puch Press (cold metal forming)
- 2) Screw Machine Parts (cutting, drilling, tapping of metal parts)
- 3) Electrical welding of metal parts (spot welding)
- 4) Electrostatic powder paint of metal pieces
- 5) Assembly of fabricated and purchased parts
- 6) Testing, inspection, and packing for its final distribution

### Building #2 - Manufacture of Fuses and Other related electrical accessories:

Current Limiting Fuses (CLF)  
Home Lighting Protectors (HLP)  
Fuse Link  
Radio Energy Management System (REMS)

- 1) Punch Press (cold metal forming)
- 2) Screw Machine Parts (cutting, drilling, tapping of metal parts)
- 3) Brazing (joining by heat two metal parts)
- 4) Plastic Molding
- 5) Assembly of all these parts together
- 6) Testing and packing for its final distribution

Raw materials utilized during the manufacturing process of this facility are summarized in Table 2.